

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

**Emilee Carpenter, LLC d/b/a Emilee
Carpenter Photography and Emilee
Carpenter,**

Plaintiffs,

v.

Letitia James, in her official capacity
as Attorney General of New York;
Johnathan J. Smith, in his official
capacity as Interim Commissioner of
the New York State Division of Human
Rights; and **Weeden Wetmore**, in his
official capacity as District Attorney of
Chemung County,

Defendants.

Case No. 6:21-cv-06303-FPG

**Plaintiffs' Notice of Pro Hac Vice
Motion**

Please take notice that upon the annexed Admission Petition Form, Admission Sponsor Affidavit, Attorney's Oath, Civility Principles and Guidelines Oath, Attorney Database and Electronic Case Filing Registration Form, attached as Exhibit A, and Proposed Order, Plaintiffs Emilee Carpenter, LLC and Emilee Carpenter, by and through its undersigned counsel, will move this Court, before the Honorable Frank P. Geraci, Jr., at the United States Courthouse, 100 State Street, Rochester, New York, at such time and date as the Court shall direct, for an Order under Local Civil Rule 83.1(c) of the United States District Court for the Western District of New York, granting *pro hac vice* admission to Bryan D. Neihart for the purposes of appearing in the above-captioned action as counsel for Plaintiffs.

Please take further notice, that under Local Civil Rule 7.1(c), any opposing papers or answering memoranda shall be filed and served at least three days before the return date.

Respectfully submitted this 6th day of May 2021.

By: s/ Raymond J. Dague
Raymond J. Dague
New York Bar No. 1242254
Dague & Martin, P.C.
4874 Onondaga Road
Syracuse, New York 13215
(315) 422-2052
(315) 474-4334 (facsimile)
rjdague@daguelaw.com

Jonathan A. Scruggs
Arizona Bar No. 030505
Bryan D. Neihart*
Arizona Bar No. 035937
Alliance Defending Freedom
15100 N. 90th Street
Scottsdale, Arizona 85260
(480) 444-0020
(480) 444-0028 (facsimile)
jscruggs@ADFlegal.org
bneihart@ADFlegal.org

ATTORNEYS FOR PLAINTIFFS

**Pro Hac Vice* Admission Filed Contemporaneously

Certificate of Service

I hereby certify that on the 6th day of May, 2021, I electronically filed the foregoing document with the Clerk of Court and that the foregoing document will be served via the CM/ECF system on all counsel of record.

s/ Raymond J. Dague

Raymond J. Dague

Attorney for Plaintiffs